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DEC -1 1998 Before The
Federal Communications Commission
Washington, DC 20554

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In the Matter of)	WT Docket 98-143
)	
1998 Biennial Regulatory Review --)	RM-9148
Amendment of Part 97 of the Commission's)	RM-9150
Amateur Service Rules)	RM-9196
)	
)	

COMMENTS AS REQUESTED BY THE COMMISSION

November 30, 1998

As an active Amateur since 1953, Callsign W9ZMR
As a holder of Amateur Extra Class License
As a Volunteer Examiner
I submit the following comments as requested
by the Commission:

1. Regarding the reduction of Amateur Classes from 6 to 4 :

This is a step in the right direction. There certainly is no need for 6 classes of licenses. I see no reason for any more than 3 classes. Basically, there are three categories of any of the services, Beginners, Skilled, and Masters. Whether you call them Technician, General, and Extra or by any other name, three classes are all that we really need. You can keep the "Advanced" if you want, but it's unnecessary.

The now designated Novice (CW) bands should be open to all licensed Amateur Radio Operators for CW use at reduced power. Whether or not a Technician Class Operator has passed a code test is immaterial. A "No-Code Tech" will not use the band because he is unskilled. A Licensed Operator who has the desire to learn the code and communicate in Morse Code (CW) will have a place to practice. Higher Class Operators will be able to share their expertise in CW procedures with newcomers.

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Phasing out the Technician Plus, or Combining it with some other class is a good idea. As stated above, Opening the "Novice CW Bands" to all classes of licensees eliminates the reason for the Technician Plus Class of license.

2. Regarding to Permit Advanced Class operators who are VEs to prepare and administer examinations for a General Class Operator License:

This is a good idea and it makes sense. Similarly, Any VE should be able to prepare and administer exams for any class lower than the class he holds. The only exception should be Extra, since this is the highest class of license.

While on this topic, the Commission should consider the requirements of the Extra Class license. Currently, any person can earn a Extra Class License by passing certain requirements in Code and Theory. I would like to see a TIME requirement for the Extra Class License, for example two years experience in a lower class license. This would ensure some minimum level of expertese reside in the Highest Class license.

The "old" Technician License, administered by the commission in years past, was far more difficult than the current exam. Holders of such licenses have a great deal of experience by now, and with the likely reduction in the Morse Code requirements, these license holders should be "Grandfathered" to GENERAL CLASS, and those who happen to be VE's should be permitted to administer Technician Class Exams. -- All General Class VE's should be permitted to administer Technician Class Examinations.

3. Regarding the Elimination of RACES:

This is a good idea. There is no practical reason for RACES any more. ARES and other "informal" organizations within the Amateur Radio Service are now capable and more efficient than the old RACES in Civil Emergencies. Some RACES members are also active in ARES, SATERN, Red Cross, and other existing services. Separate Licenses only add confusion.

4. Regarding how to better utilize the services of the Amateur Auxiliary:

While the Commission specifically does not seek comment on the ARRL proposal, the Commission DOES request additional suggestions. The best suggestion is to keep an open mind. Complaints regarding "law breakers" always have a basis in fact.

Too many times the Commission ignores complaints because "we have to hear it ourselves". This closed-mind attitude on the part of the Commission often leaves a bitter taste, and leads to further law violations by the offender because complaints are ignored. The commission only acts after numerous complaints are filed, and by then the violations have become flagrant. The commission should keep an open mind and take a first complaint seriously.

5. Regarding Telegraphy Examination Requirements:

Many applicants have convinced themselves that they cannot copy code, and they use the excuse that code is unnecessary and out-dated. Of course, both of these statements are false.

However, The actual method of testing could be modified. Young applicants, sometimes younger than ten years of age, have no trouble whatsoever copying code. The younger ones have trouble understanding the questions regarding their nearly perfect copy. They don't know what the words mean, and they print so large that they run out of paper.

A one-minute solid copy of the code should take precedence over answering questions. After all, the test is to see if the applicant can copy code, not whether he knows that France is a Country. (Where does the sender live?) Right now the "correct" answers count more than copied code.

There is a proposal to replace the code test with a more-difficult written examination. This is a barrier to younger applicants, and it does a dis-service to the entire Amateur Radio Service.

Morse Code is BASIC. Without it is like studying mathematics without having learned to count. Sure, you'll get the right answer with a calculator, but are you are no mathematician. Sure you can talk on a radio, but you are no radio operator.

Quite a few "no-code techs" have returned to upgrade their licenses. Suddenly this impossible task is no longer impossible, because they have seen the value of knowing the Morse Code. It takes some people longer than others to realize this.

So - the code should be retained as part of the examination for higher class licenses.

For those people who insist they are otherwise qualified, and except for the code they could be of value to the Amateur Radio Service, and they would prefer a more difficult theory exam in lieu of a 5 WPM code exam, perhaps an EITHER-OR arrangement could be used;

Either take the 5 wpm code test (easy for youngsters) or take a more difficult Theory Test (easy for EEs)

I believe a five word per minute code test is the minimum speed requirement for a higher class license.

If a person can copy 5, he can copy 10 - with minimal practice. I believe a code examination at 5 WPM would be adequate for a General Class Code Examination. However, if the ADVANCED CLASS license is to be retained, (see my comment #1 above) an exam at 13 WPM should be required for the ADVANCED CLASS License.

Here are my reasons:

The method of copying code by ear is different above 10 WPM. Up to 10 WPM you copy "letters" After 10 WPM you start copying "words" or "syllables". Since this is a different skill, it should require a different examination. This was the reason for the 13 WPM exam in the first place.

Similarly, at speeds approaching 20 WPM you begin to copy "sentences" or "groups of words". Again, this is a different skill and the EXTRA exam should retain the 20 wpm code requirement. The Highest Class License should be held by the Highest Qualified People.

Understanding that at 20 wpm some older people have writing that fast, although they may have perfect copy "in the head", the taking of notes as well as copying verbatim should be encouraged. The written portion of the CW exam will prove whether or not the applicant can copy at that speed.

The written portion of the CW test SHOULD NOT BE MULTIPLE CHOICE. Fill in the blanks is okay, so are questions such as "Where Does The Sender Live". Choices such as France, Spain, England, etc can be "guessed" and should be avoided. Again, solid copy is preferred, but unrealistic among elderly applicants.

Specifically answering the Commission's question, "Should we continue to have three different levels...?" My answer is Yes, and the numbers 5, 13, and 20 are those levels, however the 13 should apply to ADVANCED, not GENERAL class.

Summary on this topic:

Technician - No Code Required (Tech+ are now General)

General = 5 WPM

Advanced = 13 WPM

Extra = 20 WPM

6. Regarding Medical Exemptions:

As a VE, I personally been involved with only one applicant who claimed medical exemption. There did not appear to be any fraud in that case. I did not, or will not, try to out-guess a physician. If the doctor says the person is physically unable to copy higher speed code, that's it.

Note that with a reduction in the General Class requirement to 5 WPM, the number medical exemption applicants would decrease. It appears that most medical exemptions are for upgrade from Technician to General, not from Advanced to Extra.

It would appear that if an applicant would fraudlantly obtain a medical exemption, he would "cheat" in other ways as well. Having the VEC request medical history would serve no purpose.

I agree with the Commission's conclusion in this matter.

7. Regarding the General Topics adequately covering significant categories... Number of questions...:

Yes, I believe the significant categories are signifinantly covered. Some categories may be covered more in-depth than necessary, but different versions of the exam cover things differently, so it all evens out.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Kenneth A. Piletic".

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